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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC  
COMPANY,  
Debtors.

JUSTICE JOHN TROTTER (RET.),  
TRUSTEE OF THE PG&E FIRE VICTIM  
TRUST,

Plaintiff,

v.

PG&E CORPORATION, PACIFIC GAS &  
ELECTRIC COMPANY, ASSOCIATED  
ELECTRIC & GAS INSURANCE  
SERVICES LIMITED, ENERGY  
INSURANCE MUTUAL LIMITED, NORTH  
AMERICAN SPECIALTY INSURANCE  
COMPANY, GREAT LAKES  
REINSURANCE (UK) SE, ENDURANCE

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

Adv. Pro. 21-03012

San Francisco Superior Court  
Case No. CGC-21-590296

**NOTICE OF MOTION OF FIRE VICTIM  
TRUSTEE FOR ENTRY OF AN ORDER  
ABSTAINING FROM HEARING  
REMOVED ACTION AND REMANDING  
TO STATE COURT**

Date: April 20, 2021

Time: 9:30 AM (Pacific Time)

Place: **Via Zoom Webinar**

United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 98102

Objection Deadline: April 13, 2021

4:00 p.m. (Pacific Time)

1 RISK SOLUTIONS ASSURANCE  
2 COMPANY, BERKLEY INSURANCE  
3 COMPANY, AMERICAN  
4 INTERNATIONAL REINSURANCE  
5 COMPANY, LTD., ALLIANZ GLOBAL  
6 RISKS US INSURANCE COMPANY,  
7 LIBERTY INSURANCE UNDERWRITERS,  
8 INC., STARR INDEMNITY & LIABILITY  
9 COMPANY, U.S. SPECIALTY  
10 INSURANCE COMPANY, CONTINENTAL  
11 CASUALTY COMPANY, BARBICAN  
12 MANAGING AGENCY LIMITED, TWIN  
13 CITY FIRE INSURANCE COMPANY,  
14 ARGONAUT INSURANCE COMPANY,  
15 HOUSTON CASUALTY COMPANY, and  
16 DOES 1-20, inclusive,

Defendants.

17 TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY JUDGE AND  
18 ALL OTHER INTERESTED PARTIES:

19 PLEASE TAKE NOTICE THAT on April 20, 2021, at 9:30 a.m. a hearing will be held by  
20 Zoom Webinar before the Honorable Dennis Montali, United States Bankruptcy Judge on the Motion  
21 Of Fire Victim Trustee For Entry Of An Order Abstaining From Hearing Removed Action And  
22 Remanding To State Court (“Motion”) filed by The Honorable John K. Trotter (Ret.), in his capacity  
23 as the Trustee (the “Trustee”) of the PG&E Fire Victim Trust (the “Trust”), appointed in the above-  
24 captioned Chapter 11 cases (the “Chapter 11 Cases”) of PG&E Corporation, et al. (“PG&E”).

25 The Motion is made pursuant to 28 U.S.C. § 1334(c), 28 U.S.C. § 1452(b) and Federal Rules  
26 of Bankruptcy Procedure 9027(d), the Trustee moves this Court to remand or abstain and return this  
27 matter to the Superior Court of California for the County of San Francisco.

28 PLEASE TAKE FURTHER NOTICE THAT the Motion is based upon the concurrently filed  
Motion, Memorandum of Points and Authorities and the Declaration of Frank M. Pitre, filed  
concurrently with this Notice, and the files and records in this case.

Pursuant to 28 U.S.C. § 1334(c), 28 U.S.C. § 1452(b) and Federal Rules of Bankruptcy  
Procedure 9027(d), the Trustee moves this Court to remand or abstain and return this matter to the  
Superior Court of California for the County of San Francisco.

1       **PLEASE TAKE FURTHER NOTICE THAT** pursuant to Sixth Amended General Order  
2 38 issued on March 5, 2021:

3       “All interested parties should consult the Bankruptcy Court’s website at  
4 www.canb.uscourts.gov for information about court operations during the COVID-19  
5 pandemic. The Bankruptcy Court’s website provides information regarding how to  
6 arrange a telephonic or video appearance. If you have any questions regarding how to  
7 appear at a court hearing, you may contact the Bankruptcy Court by calling 888-821-  
8 7606 or by using the Live Chat feature on the Bankruptcy Court’s website.”  
9

10 DATED: March 29, 2021

BROWN RUDNICK LLP

11  
12 By:

  
JOEL S. MILIBAND

Attorney for *Fire Victim Trustee*